

August 27, 2018

U.S. Environmental Protection Agency
Attn: Mr. Brian Storey
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive, Mail Code: D243-04
Research Triangle Park, NC 27709

RE: Glen-Gery Corporation Request for Extension of Compliance
40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants
Brick and Structural Clay Products Manufacturing Source Category

Mr. Storey

Please find enclosed the Request for Extension of Compliance, 40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants, Brick and Structural Clay Products Manufacturing Source Category for the following Glen-Gery Corporation facilities:

- Marseilles IL manufacturing facility
- Manassas VA manufacturing facility

Both facilities have applied for Title V synthetic minor status and are currently awaiting approval by their respective State. If you have any additional questions please contact me at mike.krzyzanowski@glengery.com or (610) 562-6422.

Sincerely,
Glen-Gery Corporation


Mike Krzyzanowski
Technical Services Manager

cc: Shannon S. Broome, Hunton Andrews Kurth LLP

Request for Extension of Compliance
40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants
Brick and Structural Clay Products Manufacturing Source Category

I. General Information**A. Facility Information**

Facility Name **Glen-Gery Corporation – Marseilles Plant**
Facility Street Address **1401 Broadway Street**
Facility Local Contact Name Title Phone (OPTIONAL)
Robert Hess Plant Manager (815) 795-6921
City State ZIP Code
Marseilles Illinois 61341
Operating Permit Number (OPTIONAL) Facility I.D. Number (OPTIONAL)
099050AAK
Responsible Official's Name/Title
John Vrobel/Vice President of Production
Street Address (if different from Facility Street Address)
1166 Spring Street
City State ZIP Code
Wyomissing PA 19610

B. Indicate the relevant standard or requirement for which you request a compliance extension:

Title 40, Part 63, Subpart JJJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

II. Timeliness of Request

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)). This request:

- ☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or
- ☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.

III. Eligibility

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a “synthetic minor” or “area” source.

IV. Compliance Schedule Information

- A. Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.

☐ **OPTION 1:** This facility intends to install controls to reduce emissions to the level of the applicable standard and will be applying for a state minor NSR construction permit, if required by the state regulations, to install the controls. If your compliance approach involves installing physical controls, undertaking material substitution, or some other method, you may wish to describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as if EPA revises the NESHAP such that compliance can be achieved by the facility without the need to install controls.

☒ **OPTION 2:** This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

- B. Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).

1. My facility has submitted an application to become synthetic minor dated April 27, 2018.

☒ Yes ☐ No

2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of emission control equipment, or initiate a process change within 30 days of obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1). *If no permits are required for such action*, the facility will initiate the activities as applicable by the dates specified below:

☐ On-site construction Date: [Click here to enter text.](#)

☐ Installation of controls Date: [Click here to enter text.](#)

☐ Process change Date: [Click here to enter text.](#)

☐ Application for _____ Date: [Click here to enter text.](#)

Comments (OPTIONAL):

An application to become a Synthetic Minor was submitted on October 04, 2017 to Illinois EPA, Division of Air Pollution Control, Permit Section and is currently under review

3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

Comments (OPTIONAL):

[Click here to enter text.](#)

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

Date: **By December 26, 2019.**

Comments (OPTIONAL):

Synthetic Minor Application approval by IEPA is unknown at this time.

- C. You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.

V. Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type)

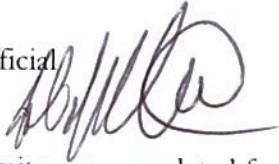
John Vrobel

Date

Title

Vice President of Manufacturing

Signature of Responsible Official



Submittal Instructions: Submit your completed form, and any addenda, to:

U.S. Environmental Protection Agency
Attention: Mr. Brian Storey
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive, Mail Code: D243-04
Research Triangle Park, NC 27709

You may also wish to send a copy of this submittal to your state or local permitting authority. Be sure that the submittal is made by August 28, 2018 and that you retain proof of the date of submittal for your records.



Glen-Gery Corporation
Marseilles, IL Plant
1401 Broadway Street
Marseilles, IL 61341

April 27, 2018

Mr. Minesh Patel
Division of Air Pollution Control, Permit Section
Illinois Environmental Protection Agency
1021 North Grand Ave. East
P.O. Box 19506
Springfield, IL 62794-9276

**Re: Glen-Gery Corporation – Marseilles, IL Plant
Manlius Township, LaSalle County, IL
Construction Permit Application
Proposed Revisions to Construction Permit No. 099050AAK Requirements**

Dear Mr. Patel:

Glen-Gery Corporation (Glen-Gery) is submitting this Construction Permit Application (Application) to the Illinois Environmental Protection Agency (IEPA) to propose revisions to certain requirements of Construction Permit I.D. No. 099050AAK, dated January 16, 2003. Glen-Gery owns and operates a brick manufacturing plant in the city of Marseilles, Manlius Township, in LaSalle County (facility). This Application is generally consistent with proposed revisions to Clean Air Act Permit Program (CAAPP) Permit I.D. No. 099050AAK, submitted to IEPA in October 2017 and has been prepared and submitted at the direction of, and in accordance with, guidance provided by IEPA after their receipt and review of the October 2017 CAAPP revision application.

Specifically, Glen-Gery is requesting federally enforceable limits that restrict annual fired brick throughput and hazardous air pollutant (HAP) emissions to classify the facility as an area source of HAP emissions and therefore, avoid the applicability of 40 CFR Part 63 Subpart KKKKK - National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing (Subpart KKKKK). This Application also proposes work practice standards associated with the operation of the dry lime adsorption (DLA) unit that is used to control hydrogen fluoride (HF) emissions from the kilns. More detail on the proposed revisions is provided below. It should be noted that there are no physical modifications to the facility proposed herein, and a new source review (NSR) applicability evaluation is not included.

The following attachments are provided as part of this Application:

- Attachment A – IEPA Permit Application Forms
- Attachment B – HAP Potential to Emit (PTE) Calculations

- Attachment C – Construction permit I.D. No. 099050AAK, Application No. 9100025 Proposed Revisions
- Attachment D – Process Flow Diagram
- Attachment E – ALL4 Quality Seal

Proposed Revisions

Glen-Gery is proposing to add an enforceable throughput limit of 178,150 tons of fired brick per year (i.e., 12-month rolling total) and a PTE limit of 9.8 tons per year of any individual HAP to Construction Permit I.D. No. 099050AAK. The proposed limits ensure that the facility is a synthetic area source of HAP emissions and meets the stated IEPA policy of limiting PTE to no greater than 9.8 tons per year for individual HAP. Because IEPA does not apply the same policy to CAAPP permit modifications, the throughput and emissions limits proposed in the October 2017 CAAPP application for significant modification were 180,000 tons of fired brick per year and 9.9 tons per year for any individual HAP. No further revisions to the CAAPP significant modification application will be submitted by Glen-Gery until instructed to do so by IEPA. The newly proposed throughput and PTE limits ensure that the facility will remain below the major source thresholds of 10 tons per year for a single HAP and 25 tons per year total HAP, which are also requested PTE limits. The PTE for HAP from the facility is presented in Attachment B. The proposed limits will apply facility-wide but will specifically impact the sources listed within Construction Permit I.D. No. 099050AAK, which include, Dryers 1-4 and Tunnel Kilns A and B. It should be noted that the forms in Attachment A refer to “Green Brick Equivalent” as a way of delineating green or wet brick pre-kiln versus fired brick post-kiln since the requested throughput limit is in terms of fired brick only.

A classification change for the facility to a synthetic area source of HAP, to avoid applicability of Subpart KKKKK, also removes a regulatory framework that allows for the operation of Subpart KKKKK affected equipment during periods of DLA downtime. This concern was identified by IEPA after their development of a draft Operating Permit reflecting the October 2017 application for significant permit modification. The permitting solution, as specified by IEPA to Glen-Gery, was to address the potential gap in the underlying construction permit to the CAAPP through a modification to the underlying construction permit (i.e., Construction Permit I.D. No. 099050AAK) through the addition of work practice standards related to the operation of the DLA as related to downtime. Therefore, the facility proposes the addition of work practice standards to Construction Permit I.D. No. 099050AAK to accommodate this rare event of kiln operation during DLA bypass. The proposed work practice standards are provided in Attachment C.

The facility has reviewed the conditions of Construction Permit I.D. No. 099050AAK that will be impacted by the proposed changes and has proposed revisions that reflect the facility's intent to

become a synthetic area source of HAP emissions. The suggested revisions are summarized in Attachment C.

Glen-Gery appreciates IEPA's consideration of this matter. Should you have any questions, related to this submittal, or require additional information, please contact Mike Krzyzanowski at (610) 207-6882 or mike.krzyzanowski@glengery.com.

Sincerely,

Glen-Gery Corporation

A handwritten signature in black ink, appearing to read 'John Vrobel', is positioned above the printed name and title.

John Vrobel

Vice President/Production

cc: Mike Krzyzanowski – Glen-Gery
Sharon Sadler – ALL4

Enclosures: Attachment A – IEPA Permit Application Forms
Attachment B – HAP Potential to Emit (PTE) Calculations
Attachment C – Construction Permit I.D. No. 099050AAK, Application No. 99100025 Proposed Revisions
Attachment D – Process Flow Diagram
Attachment E – ALL4 Quality Seal



Illinois Environmental Protection Agency

Bureau of Air • 1021 North Grand Avenue East • P.O. Box 19506 • Springfield • Illinois • 62794-9506

FEE DETERMINATION FOR CONSTRUCTION PERMIT APPLICATION

FOR AGENCY USE ONLY

ID Number: _____ Permit #: _____
☐ Complete ☐ Incomplete Date Complete: _____
Check Number: _____ Account Name: _____

This form is to be used to supply fee information that must accompany all construction permit applications. This application must include payment in full to be deemed complete. Make check or money order payable to the Illinois Environmental Protection Agency, Division of Air Pollution Control - Permit Section at the above address. Do NOT send cash. Refer to instructions (197-INST) for assistance.

Source Information

1. Source Name: Glen-Gery Corporation
2. Project Name: Significant Modification Application 3. Source ID #: (if applicable) 099050AAK
4. Contact Name: Mike Krzyzanowski 5. Contact Phone #: (610) 562-6422

Fee Determination

6. The boxes below are automatically calculated.

Section 1 Subtotal \$0.00 + Section 2, 3 or 4 Subtotal \$2,000.00 = \$2,000.00
Grand Total

Section 1: Status of Source/Purpose of Submittal

7. Your application will fall under only one of the following five categories described below. Check the box that applies. Proceed to applicable sections. For purposes of this form:

- **Major Source** is a source that is required to obtain a CAAPP permit.
- **Synthetic Minor Source** is a source that has taken limits on potential to emit in a permit to avoid CAAPP permit requirements (e.g., FESOP).
- **Non-Major Source** is a source that is not a major or synthetic minor source.

- ☒ Existing source without status change or with status change from synthetic minor to major source or vice versa. Proceed to Section 2.
- ☐ Existing non-major source that will become synthetic minor to major source. Proceed to Section 4.
- ☐ New major or synthetic minor source. Proceed to Section 4.
- ☐ New non-major source. Proceed to Section 3.

\$0.00
Section 1 Subtotal

- ☐ AGENCY ERROR. If this is a timely request to correct an issued permit that involves only an agency error and if the request is received within the deadline for a permit appeal to the Pollution Control Board. Skip Sections 2, 3 and 4. Proceed directly to Section 5.

This agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 ET SEQ. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Section 2: Special Case Filing Fee


8. **Filing Fee.** If the application only addresses one or more of the following, check the appropriate boxes, skip Sections 3 and 4 and proceed directly to Section 5. Otherwise, proceed to Section 3 or 4 as appropriate.

- Addition or replacement of control devices on permitted units.
- Pilot projects/trial burns by a permitted unit
- Land remediation projects
- Revisions related to methodology or timing for emission testing
- Minor administrative-type change to a permit

| | | |
|-----|---|------------------|
| 9. | This application consists of a single new emission unit or no more than two modified emission units. (\$500 fee) | 9. _____ \$0.00 |
| 10. | This application consists of more than one new emission unit or more than two modified units. (\$1,000 fee) | 10. _____ |
| 11. | This application consists of a new source or emission unit subject to Section 39.2 of the Act (i.e., Local Siting Review); a commercial incinerator or a municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or an emission unit designated as a complex source by agency rulemaking. (\$15,000 fee) | 11. _____ |
| 12. | A public hearing is held (see instructions). (\$10,000 fee) | 12. _____ |
| 13. | Section 3 subtotal. (lines 9 through 12 - entered on page 1) | 13. _____ \$0.00 |

| | | |
|--|---|-----------------------|
| Application contains modified emission units only | 14. For the first modified emission unit, enter \$2,000. | 14. <u>\$2,000.00</u> |
| | 15. Number of additional modified emission units = _____ x \$1,000. | 15. <u>\$0.00</u> |
| | 16. Line 14 plus line 15, or \$5,000, whichever is less. | 16. <u>\$2,000.00</u> |
| Application contains new and/or modified emission units | 17. For the first new emission unit, enter \$4,000. | |
| | 18. Number of additional new and/or modified emission units = _____ x \$1,000. | 18. <u>\$0.00</u> |
| | 19. Line 17 plus line 18, or \$10,000, whichever is less. | 19. <u>\$0.00</u> |
| Application contains netting exercise | 20. Number of individual pollutants that rely on a netting exercise or contemporaneous emissions decrease to avoid application of PSD or nonattainment area NSR = _____ x \$3,000. | 20. <u>\$0.00</u> |
| Additional Supplemental Fees | 21. If the new source or emission unit is subject to Section 39.2 of the Act (i.e. siting); a commercial incinerator or other municipal waste, hazardous waste, or waste tire incinerator; a commercial power generator; or one or more other emission units designated as a complex source by Agency rulemaking, enter \$25,000. | 21. _____ |
| | 22. If the source is a new major source subject to PSD, enter \$12,000. | 22. _____ |
| | 23. If the project is a major modification subject to PSD, enter \$6,000. | 23. _____ |
| | 24. If this is a new major source subject to nonattainment area (NAA) NSR, enter \$20,000. | 24. _____ |
| | 25. If this is a major modification subject to NAA NSR, enter \$12,000. | 25. _____ |
| | 26. If the application involves a determination of MACT for a pollutant and the project is not subject to BACT or LAER for the related pollutant under PSD or NSR (e.g., VOM for organic HAP), enter \$5,000 per unit for which a determination is requested or otherwise required. _____ x \$5,000. | 26. <u>\$0.00</u> |
| | 27. If a public hearing is held (see instructions), enter \$10,000. | 27. _____ |
| 28. Section 4 subtotal (line 16 and lines 19 through 28) to be entered on page 1 | | 28. <u>\$2,000.00</u> |

NOTE: Applications without a signed certification will be deemed incomplete.

by: 
Signature
John Vrobel
Typed or Printed Name of Signatory

4.24.18
Date